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Case No. 4:20-cv-03664-YGR-SVK

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I, Jonathan Tse, declare as follows:

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Request For an Order to Show Cause at: Pages 1:11-12 Motion at: Pages 1:8-15, 1:20-21. 1:23, 1:25, 2:13, 2:22, 3:4, 3:7, 4:18-22, 5:8, 5:16, 5:25, 6:4, 6:6, 6:16, 6:21, 8:1-8, 8:12, 8:19, 9:14-24, 9:27, 10:9-10, 11:6, 11:21-23, 12:3-4, 13:16, 13:19, 13:22-23, 14:7-10 14:12, 14:20-21, 15:3, 15:7, 15:21, 16:12-14, 16:23, 17:22,

18:4, 18:22, 18:25, 19:6, 19:13

Document

Plaintiffs' Request for Order For

Google To Show Cause for Why It Should Not Be Sanctioned for

Discovery Misconduct at

I am a member of the bar of the State of California and an attorney at Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC ("Google") in this action. I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

2. I am making this declaration pursuant to Civil Local Rule 79-5(e)-(f) as an attorney for Google as the Designating Party, pursuant to Civil Local Rule 79-5(f)(3) in response to Dkt. 429.

3. On February 26, 2022, Plaintiffs filed a Motion for Order Requiring Google to Show Cause Why It Should Not Be Sanctioned For Discovery Misconduct (Dkts. 429, 430). On February 26, 2022, I received an unredacted service copy of these documents.

4. I have reviewed the documents that Plaintiffs seek to file under seal pursuant to Civil Local Rule 79-5. Based on my review, there is good cause to seal the following information:

> **Basis for Sealing** The information requested to be sealed contains Google's

> highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals and logs and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

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1	Declaration of Mark C. Mao in	The information requested to be sealed contains Google's			
	Support of Plaintiffs' Order to	highly confidential and proprietary information regarding			
2	Show Cause Motion at	highly sensitive features of Google's internal systems and			
3	B 100110151060500	operations, including various types of Google's internal			
	Pages 1:8-9, 1:12-15, 1:26-27, 2:3,	projects, data signals and logs and their proprietary			
4	2:11, 2:17-19, 2:23-26, 3:1, 3:12- 14, 3:16-17, 3:20-28, 4:5, 4:8-10,	functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its			
5	4:13-14, 4:16-17, 4:19-21, 5:5-6,	business and is not generally known to the public or			
	5:8, 5:10, 5:15, 5:18, 6:2, 6:5-6,	Google's competitors. Such confidential and proprietary			
6	6:10, 6:13, 6:19-20, 6:23, 7:4, 7:8,	information reveals Google's internal strategies, system			
7	7:13, 7:15-16	designs, and business practices for operating and			
		maintaining many of its important services, and falls within			
8		the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such			
9		confidential and proprietary information could affect			
10		Google's competitive standing as competitors may alter			
10		their systems and practices relating to competing products.			
11		It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the			
12		information to compromise Google's internal practices			
		relating to competing products.			
13					
14	Mao Decl., Exhibit 1	The information requested to be sealed contains Google's			
	(GOOG-BRWN-00845639) at	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and			
15	Page 2	operations, including various types of Google's internal			
16		projects and their proprietary functionalities, that Google			
17		maintains as confidential in the ordinary course of its			
17		business and is not generally known to the public or			
18		Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system			
19		designs, and business practices for operating and			
17		maintaining many of its important services, and falls within			
20		the protected scope of the Protective Order entered in this			
21		action. See Dkt. 81 at 2-3. Public disclosure of such			
		confidential and proprietary information could affect Google's competitive standing as competitors may alter			
22		their systems and practices relating to competing products.			
23		It may also place Google at an increased risk of			
24		cybersecurity threats, as third parties may seek to use the			
24		information to compromise Google's internal practices			
25	Mao Decl., Exhibit 2	relating to competing products. The information requested to be sealed contains Google's			
26	(GOOG-BRWN-00845596) at	highly confidential and proprietary information regarding			
		highly sensitive features of Google's internal systems and			
27	Page 1	operations, including various types of Google's internal			
28		projects and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its			
_		manitanis as confidential in the ordinary course of its			

1		business and is not generally known to the public or
2		Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system
		designs, and business practices for operating and
3		maintaining many of its important services, and falls within
4		the protected scope of the Protective Order entered in this
5		action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
		Google's competitive standing as competitors may alter
6		their systems and practices relating to competing products.
7		It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the
8		information to compromise Google's internal practices
		relating to competing products.
9	Mao Decl., Exhibit 3	The information requested to be sealed contains Google's
10	(GOOG-BRWN-00845423) at:	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
11	 Entirety	operations, including various types of Google's internal project, data signals and logs and their proprietary
12		functionalities, as well as internal metrics, that Google
13		maintains as confidential in the ordinary course of its
		business and is not generally known to the public or Google's competitors. Such confidential and proprietary
14		information reveals Google's internal strategies, system
15		designs, and business practices for operating and
16		maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this
		action. See Dkt. 81 at 2-3. Public disclosure of such
17		confidential and proprietary information could affect
18		Google's competitive standing as competitors may alter their systems and practices relating to competing products.
19		It may also place Google at an increased risk of
		cybersecurity threats, as third parties may seek to use the
20		information to compromise Google's internal practices
21	Mao Decl., Exhibit 4	relating to competing products. The information requested to be sealed contains Google's
22	(GOOG-BRWN-00023909) at	highly confidential and proprietary information regarding its
	 Entirety	employees, their organizational division, manager, and title,
23	Entirety	that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or
24		Google's competitors. Such confidential and proprietary
25		information reveals Google's internal strategies, system designs, and business practices for operating and
26		maintaining many of its important services, and falls within
		the protected scope of the Protective Order entered in this
27		action. See Dkt. 81 at 2-3. Public disclosure of such
28		confidential and proprietary information could affect Google's competitive standing as competitors may attempt

1		to contact and/or hire these employees relating to competing
$_{2}$		products. It may also place Google at an increased risk of
		cybersecurity threats, as third parties may seek to use the
3		information to compromise Google's internal practices relating to competing products.
4	Mao Decl., Exhibit 8	The information requested to be sealed contains Google's
5	(excerpts from the December 2,	highly confidential and proprietary information regarding
3	2021 deposition of Google employee Chris Liao) at	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
6	employee emis Liao) at	projects, data signals and logs and their proprietary
7	122:24, 123:2, 123:8, 123:22-25,	functionalities, that Google maintains as confidential in the
′	124:1-26, 125:1-12, 126:6, 126:8,	ordinary course of its business and is not generally known
8	126:12, 126:23, 127:9-25, 128:1-	to the public or Google's competitors. Such confidential and
9	17, 129:3, 131:18-25, 132:1-25, 133:1-25, 134:1-20, 138:10,	proprietary information reveals Google's internal strategies, system designs, and business practices for operating and
	138:19, 139:7, 139:18, 139:24,	maintaining many of its important services, and falls within
10	140:5, 140:21, 141:13-25	the protected scope of the Protective Order entered in this
11		action. See Dkt. 81 at 2-3. Public disclosure of such
10		confidential and proprietary information could affect
12		Google's competitive standing as competitors may alter their systems and practices relating to competing products.
13		It may also place Google at an increased risk of
14		cybersecurity threats, as third parties may seek to use the
14		information to compromise Google's internal practices
15	M D 1 E 13170	relating to competing products.
16	Mao Decl., Exhibit 9 (GOOG-BRWN-00845312) at	The information requested to be sealed contains Google's highly confidential and proprietary information regarding
	(GGGG-DKW1V-00043312) at	highly sensitive features of Google's internal systems and
17	Entirety	operations, including various types of Google's internal
18		project, data signals and logs and their proprietary
		functionalities, that Google maintains as confidential in the
19		ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and
20		proprietary information reveals Google's internal strategies,
21		system designs, and business practices for operating and
21		maintaining many of its important services, and falls within
22		the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such
23		confidential and proprietary information could affect
		Google's competitive standing as competitors may alter
24		their systems and practices relating to competing products.
25		It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the
26		information to compromise Google's internal practices
26		relating to competing products.
27	Mao Decl., Exhibit 10	The information requested to be sealed contains Google's
28	(GOOG-BRWN-00845569) at	highly confidential and proprietary information regarding
20		highly sensitive features of Google's internal systems and

1	Entirety	operations, including various types of Google's internal			
2		projects, data signals and logs and their proprietary			
		functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its			
3		business and is not generally known to the public or			
4		Google's competitors. Such confidential and proprietary			
5		information reveals Google's internal strategies, system designs, and business practices for operating and			
		maintaining many of its important services, and falls within			
6		the protected scope of the Protective Order entered in this			
7		action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect			
8		Google's competitive standing as competitors may alter			
		their systems and practices relating to competing products.			
9		It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the			
10		information to compromise Google's internal practices			
11		relating to competing products.			
12	Mao Decl., Exhibit 11 (GOOG-BRWN-00845277) at	The information requested to be sealed contains Google's highly confidential and proprietary information regarding			
12	(GOOG-BKWIN-00643277) at	highly sensitive features of Google's internal systems and			
13	Entirety	operations, including various types of Google's internal			
14		projects and their proprietary functionalities, as well as internal metrics and investigation into financial impact of			
15		certain features, that Google maintains as confidential in the			
		ordinary course of its business and is not generally known			
16		to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies,			
17		system designs, and business practices for operating and			
18		maintaining many of its important services, and falls within			
19		the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such			
		confidential and proprietary information could affect			
20		Google's competitive standing as competitors may alter			
21		their systems and practices relating to competing products. It may also place Google at an increased risk of			
22		cybersecurity threats, as third parties may seek to use the			
		information to compromise Google's internal practices relating to competing products.			
23	Mao Decl., Exhibit 12	The information requested to be sealed contains Google's			
24	(GOOG-CABR-05144884) at	highly confidential and proprietary information regarding			
25		highly sensitive features of Google's internal systems and operations, including various types of Google's internal			
26	Entirety	projects, as well as internal metrics and investigation into			
		financial impact of certain features, that Google maintains			
27		as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.			
28		Such confidential and proprietary information reveals			
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1		Google's internal strategies, system designs, and business
2		practices for operating and maintaining many of its important services, and falls within the protected scope of
3		the Protective Order entered in this action. See Dkt. 81 at 2-
		3. Public disclosure of such confidential and proprietary
4		information could affect Google's competitive standing as competitors may alter their systems and practices relating to
5		competing products. It may also place Google at an
6		increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal
7		practices relating to competing products.
	Mao Decl., Exhibit 14	The information requested to be sealed contains Google's
8	(GOOG-CABR-04324934) at	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
9	.	operations, including various types of Google's internal
10	Entirety	projects and their proprietary functionalities, as well as internal metrics and investigation into financial impact of
11		certain features, that Google maintains as confidential in the
		ordinary course of its business and is not generally known
12		to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies,
13		system designs, and business practices for operating and
14		maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this
15		action. See Dkt. 81 at 2-3. Public disclosure of such
16		confidential and proprietary information could affect Google's competitive standing as competitors may alter
17		their systems and practices relating to competing products.
		It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the
18		information to compromise Google's internal practices
19	Mao Decl., Exhibit 15	relating to competing products. The information requested to be sealed contains Google's
20	(GOOG-BRWN-00845477) at	highly confidential and proprietary information regarding
21	Entirety	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
22	Limitely	projects, data signals and logs and their proprietary
		functionalities, as well as internal metrics, that Google
23		maintains as confidential in the ordinary course of its business and is not generally known to the public or
24		Google's competitors. Such confidential and proprietary
25		information reveals Google's internal strategies, system designs, and business practices for operating and
26		maintaining many of its important services, and falls within
27		the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such
		confidential and proprietary information could affect
28		Google's competitive standing as competitors may alter
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1		their systems and practices relating to competing products.
2		It may also place Google at an increased risk of
2		cybersecurity threats, as third parties may seek to use the
3		information to compromise Google's internal practices relating to competing products.
4	Mao Decl., Exhibit 16	The information requested to be sealed contains Google's
4	(GOOG-BRWN-00845481) at	highly confidential and proprietary information regarding
5	, , , , , , , , , , , , , , , , , , , ,	highly sensitive features of Google's internal systems and
	Entirety	operations, including various types of Google's internal
6		project, data signals and logs and their proprietary
7		functionalities, as well as internal metrics and investigation
0		into financial impact of certain features, that Google maintains as confidential in the ordinary course of its
8		business and is not generally known to the public or
9		Google's competitors. Such confidential and proprietary
10		information reveals Google's internal strategies, system
10		designs, and business practices for operating and
11		maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this
12		action. See Dkt. 81 at 2-3. Public disclosure of such
12		confidential and proprietary information could affect
13		Google's competitive standing as competitors may alter
14		their systems and practices relating to competing products.
		It may also place Google at an increased risk of
15		cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices
16		relating to competing products.
	Mao Decl., Exhibit 17	The information requested to be sealed contains Google's
17	(GOOG-BRWN-00845437) at	highly confidential and proprietary information regarding
18	n d	highly sensitive features of Google's internal systems and
10	Entirety	operations, including various types of Google's internal projects, data signals and logs and their proprietary
19		functionalities, that Google maintains as confidential in the
20		ordinary course of its business and is not generally known
21		to the public or Google's competitors. Such confidential and
21		proprietary information reveals Google's internal strategies,
22		system designs, and business practices for operating and maintaining many of its important services, and falls within
23		the protected scope of the Protective Order entered in this
23		action. See Dkt. 81 at 2-3. Public disclosure of such
24		confidential and proprietary information could affect
25		Google's competitive standing as competitors may alter
		their systems and practices relating to competing products.
26		It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the
27		information to compromise Google's internal practices
		relating to competing products.
28		

1	Mao Decl., Exhibit 18	The information requested to be sealed contains Google's
2	(GOOG-CABR-05280756) at	highly confidential and proprietary information regarding
	Entirety	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
3	Entirety	projects, data signals and logs and their proprietary
4		functionalities, as well as internal metrics, that Google
ا ہے		maintains as confidential in the ordinary course of its
5		business and is not generally known to the public or Google's competitors. Such confidential and proprietary
6		information reveals Google's internal strategies, system designs, and business practices for operating and
7		maintaining many of its important services, and falls within
8		the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such
9		confidential and proprietary information could affect
10		Google's competitive standing as competitors may alter their systems and practices relating to competing products.
11		It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the
12		information to compromise Google's internal practices
		relating to competing products.
13	Mao Decl., Exhibit 19	The information requested to be sealed contains Google's
14	(excerpts of Google's Responses and Objections to Plaintiffs' Ninth	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
15	Set of Interrogatories) at	operations, including various types of Google's internal log,
	-	that Google maintains as confidential in the ordinary course
16	4:13	of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary
17		information reveals Google's internal strategies, system
18		designs, and business practices for operating and maintaining many of its important services, and falls within
19		the protected scope of the Protective Order entered in this
		action. See Dkt. 81 at 2-3. Public disclosure of such
20		confidential and proprietary information could affect
21		Google's competitive standing as competitors may alter their systems and practices relating to competing products.
22		It may also place Google at an increased risk of
		cybersecurity threats, as third parties may seek to use the
23		information to compromise Google's internal practices relating to competing products.
24	Mao Decl., Exhibit 20	The information requested to be sealed contains Google's
25	(February 23, 2022 email	highly confidential and proprietary information regarding
	exchange between counsel for Plaintiffs and counsel for Google)	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
26	at	projects, data signals and logs and their proprietary
27		functionalities, that Google maintains as confidential in the
28	Pages 1-3	ordinary course of its business and is not generally known
۷۵		to the public or Google's competitors. Such confidential and

1		proprietary information reveals Google's internal strategies,
2		system designs, and business practices for operating and
		maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this
3		action. See Dkt. 81 at 2-3. Public disclosure of such
4		confidential and proprietary information could affect
		Google's competitive standing as competitors may alter
5		their systems and practices relating to competing products.
6		It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the
7		information to compromise Google's internal practices
′		relating to competing products.
8	Mao Decl., Exhibit 21	The information requested to be sealed contains Google's
9	(GOOG-CABR-05757329) at	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
	Entirety	operations, including various types of Google's internal
10		projects, data signals and logs and their proprietary
11		functionalities, as well as internal metrics, that Google
12		maintains as confidential in the ordinary course of its business and is not generally known to the public or
12		Google's competitors. Such confidential and proprietary
13		information reveals Google's internal strategies, system
14		designs, and business practices for operating and
		maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this
15		action. See Dkt. 81 at 2-3. Public disclosure of such
16		confidential and proprietary information could affect
17		Google's competitive standing as competitors may alter
		their systems and practices relating to competing products. It may also place Google at an increased risk of
18		cybersecurity threats, as third parties may seek to use the
19		information to compromise Google's internal practices
20	M D I E 137 22	relating to competing products.
20	Mao Decl., Exhibit 22 (GOOG-BRWN-00845281) at	The information requested to be sealed contains Google's highly confidential and proprietary information regarding
21	(3333 21711 333 13231) at	highly sensitive features of Google's internal systems and
22	Entirety	operations, including various types of Google's internal
		projects, data signals and logs and their proprietary
23		functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its
24		business and is not generally known to the public or
25		Google's competitors. Such confidential and proprietary
		information reveals Google's internal strategies, system
26		designs, and business practices for operating and maintaining many of its important services, and falls within
27		the protected scope of the Protective Order entered in this
		action. See Dkt. 81 at 2-3. Public disclosure of such
28		confidential and proprietary information could affect
- 1	1	

1		Google's competitive standing as competitors may alter
2		their systems and practices relating to competing products.
2		It may also place Google at an increased risk of
3		cybersecurity threats, as third parties may seek to use the
		information to compromise Google's internal practices
4	Mac Deal Errhibit 22	relating to competing products.
5	Mao Decl., Exhibit 23 (GOOG-BRWN-00845275) at	The information requested to be sealed contains Google's highly confidential and proprietary information regarding
	(GOOG-BRW14-0004-3273) at	highly sensitive features of Google's internal systems and
6	Entirety	operations, including various types of Google's internal
7		projects, data signals and logs and their proprietary
′		functionalities, as well as internal metrics, that Google
8		maintains as confidential in the ordinary course of its
		business and is not generally known to the public or
9		Google's competitors. Such confidential and proprietary
10		information reveals Google's internal strategies, system designs, and business practices for operating and
		designs, and business practices for operating and maintaining many of its important services, and falls within
11		the protected scope of the Protective Order entered in this
12		action. See Dkt. 81 at 2-3. Public disclosure of such
		confidential and proprietary information could affect
13		Google's competitive standing as competitors may alter
14		their systems and practices relating to competing products.
1.		It may also place Google at an increased risk of
15		cybersecurity threats, as third parties may seek to use the
16		information to compromise Google's internal practices relating to competing products.
10	Mao Decl., Exhibit 24	The information requested to be sealed contains Google's
17	(GOOG-BRWN-00845274) at	highly confidential and proprietary information regarding
18	,	highly sensitive features of Google's internal systems and
10	Entirety	operations, including various types of Google's internal
19		projects, data signals, and links to internal documents, that
20		Google maintains as confidential in the ordinary course of
20		its business and is not generally known to the public or Google's competitors. Such confidential and proprietary
21		information reveals Google's internal strategies, system
22		designs, and business practices for operating and
22		maintaining many of its important services, and falls within
23		the protected scope of the Protective Order entered in this
		action. See Dkt. 81 at 2-3. Public disclosure of such
24		confidential and proprietary information could affect
25		Google's competitive standing as competitors may alter their systems and practices relating to competing products.
		It may also place Google at an increased risk of
26		cybersecurity threats, as third parties may seek to use the
27		information to compromise Google's internal practices
		relating to competing products.
28		

1	Mao Decl., Exhibit 25 (GOOG-CABR-03668216) at The information requested to be sealed contains Google's highly confidential and proprietary information regarding				
2	highly sensitive features of Google's internal systems and				
3	Entirety operations, including various types of Google's internal projects, data signals and logs and their proprietary				
4	functionalities, as well as internal metrics, that Google				
5	maintains as confidential in the ordinary course of its business and is not generally known to the public or				
6	Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system				
7	designs, and business practices for operating and maintaining many of its important services, and falls within				
8	the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such				
9	confidential and proprietary information could affect Google's competitive standing as competitors may alter				
10	their systems and practices relating to competing products.				
11	It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the				
12	information to compromise Google's internal practices relating to competing products.				
13	relating to competing products.				
14	5. Google's request is narrowly tailored in order to protect its confidential information.				
15	These redactions are limited in scope and volume. Because the proposed redactions are narrowly				
16	tailored and limited to portions containing Google's highly-confidential or confidential information,				
17	Google requests that the portions of the aforementioned documents be redacted from any public				
18	version of those documents.				
19	6. Google has pared back Plaintiffs' proposed redactions does not seek to redact or file				
20	under seal any of the remaining portions of Plaintiffs' Motion not indicated in the table above.				
21	I declare under penalty of perjury of the laws of the United States that the foregoing is true				
22	and correct. Executed in San Francisco, California on March 23, 2022.				
23	DATED: March 23, 2022 QUINN EMANUEL URQUHART &				
24	SULLIVAN, LLP				
25					
26	By /s/ Jonathan Tse				
27	Jonathan Tse				
28	Attorney for Defendant				
	11 Case No. 4:20-cv-03664-YGR-SVK				
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TSE DECLARATION ISO OF PLAINTIFFS' ADMINISTRATIVE MOTION TO SEAL

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